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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JUANA A. CRUZ DE RAMIREZ, an
12 individual,

13 Plaintiff

vs.

14 CARDENAS MARKETS, LLC aka
15 CARDENAS, a foreign limited liability
company; LAMANZA LLC, a domestic
16 limited liability company; DOE
MAINTENANCE COMPANY 1-10; DOE
17 INDIVIDUALS 1-20; and ROE BUSINESS
ENTITIES 1-20, inclusive,

18 Defendants

19 CASE NO.: 2:19-cv-00814-RFB-BNW

20 [PROPOSED] STIPULATION AND
21 ORDER TO EXTEND JOINT PRETRIAL
22 ORDER DEADLINE (SECOND
23 REQUEST)

24 Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record,
25 hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-
26 captioned matter. Good cause exists to extend the remaining deadline for the reasons explained
27 below.

28 **A. Reasons For the Extension**

29 On March 22, 2021 a hearing was held regarding Defendant's Motion for Summary
30 Judgment which was subsequently denied. The courts ordered that the parties submit their Joint
31 Pretrial Order within thirty (30) days of said ruling. Recently, counsel conferred regarding an
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1 extension of time to submit the parties' Joint Pretrial Order in this case. Counsel agree that
2 additional time is needed in order to fully and properly identify portions of deposition transcripts
3 intended to be used at the time of trial and provide objections regarding the same. Additionally,
4 the parties are tentatively scheduled for mediation on June 7, 2021 in order to participate in
5 meaningful negotiations.

6 As such, the May 13, 2021 deadline should be extended so that the parties are able to
7 provide a proper Joint Pretrial Order to the Court and participate in meaningful settlement
8 negotiations.

9 **B. Proposed Revised Pretrial Order Schedule**

10 The Joint Pretrial Order is due on May 13, 2021 and the parties are requesting the deadline
11 be moved to June 18, 2021. This request for an extension of time is not sought for any improper
12 purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of
13 allowing sufficient time to adequately prepare their pretrial order to include portions of
14 depositions in which the parties intend to use at the time of trial. Additionally, the extension of
15 time will allow the parties to participate in meaningful settlement negotiations through mediation.
16 The parties respectfully submit that the reasons set forth above constitute compelling reasons and
17 good cause for the short extension.

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1 WHEREFORE, the parties respectfully request that this Court extend the deadline for
2 submitting their Joint Pretrial Order from the current deadline as outlined above.

3 DATED this 13th day of April, 2021.

DATED this 13th day of April, 2021.

4 **MAINOR WIRTH, LLP**

**WILSON ELSER MOSKOWITZ
EDELMAN & DICKER, LLP**

5
6 /s/ *Ash Marie Blackburn*

/s/ *Michael Lowry*

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16 **ORDER**

17 IT IS SO ORDERED.

18 DATED this 18th day of May, 2021.

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22 **RICHARD E. BOULWARE, II**
23 **United States District Court**
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